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Attorney for Plaintiff
CRYSTAL JOY CHITTY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CRYSTAL JOY CHITTY,

Plaintiff,

v.

COMMISSIONER OF
SOCIAL SECURITY,

Defendant.

No. 2:24-CV-01945 (CKD)

**MOTION FOR 30-DAY BRIEFING
EXTENSION; ORDER**

On July 16, 2024, Plaintiff Crystal Joy Chitty filed the above-referenced action seeking judicial review of the defendant Commissioner of Social Security's denial of her claim for Social Security disability benefits. (ECF Doc. 1) The defendant responded to Plaintiff's Complaint on September 20, 2024. (ECF Doc. 10). Pursuant to the Court's Scheduling Order, Plaintiff's motion for summary judgment is due to be filed on or before October 21, 2024. (ECF Doc. 7, at p.2:12-14)

Plaintiff HEREBY MOVES for an extension of thirty (30) days within which to file her motion for summary judgment. (ECF Doc. 7, at p.2:24-25) This is Plaintiff's first request for an extension of time. Counsel seeks the extension due to conflicting briefing deadlines in other matters and, as Plaintiff's counsel was not involved at the administrative level, to effectively advocate for Plaintiff as a close review of the administrative record concerning Plaintiff's medical

issues is necessary and required. *See, Costa v. Comm'r of Soc. Sec. Admin.*, 690 F.3d 1132, 1134 n. 1 (9th Cir. 2012) [noting “social security disability cases are often highly fact-intensive and require careful review of the administrative record, including complex medical evidence.”].

On October 11, 2024, counsel for the Defendant informed Plaintiff’s counsel by email that the Commissioner of Social Security has no objection to the requested extension and does not oppose Plaintiff’s motion.

Respectfully submitted,

Dated: October 11, 2024

NEWEL LAW

By: Melissa Newel
Melissa Newel
Attorney for Plaintiff
CRYSTAL JOY CHITTY

ORDER

Good cause having been shown, IT IS ORDERED that Plaintiff’s motion for extension of time (ECF NO. 11) is GRANTED. Plaintiff’s Opening Brief shall now be filed on or before November 20, 2024, and all corresponding deadlines are modified accordingly.

Dated: October 16, 2024


CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE